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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 INTERNATIONAL MARKETS LIVE INC.,
a New York corporation dba IM MASTERY
16 ACADEMY,

17 Plaintiff,

18 v.

19 DAVID IMONITIE an individual; SPELA
SLUGA, an individual; DEVON ROESER, an
20 individual; IVAN TAPIA, an individual;
NVISIONU, INC., a Delaware corporation;
21 ILYKIT, LLC, a Utah limited liability
company, LUCAS LONGMIRE, an
22 individual; NATHAN SAMUEL, an
individual; MICHAEL ZHOR, an individual;
23 IMRAN RICHIE, an individual; JUSTIN
OWENS, an individual; PAULO
24 CAVALLERI, an individual; JOSE MIGUEL
CONTREAS, an individual; BASS GRANT,
25 an individual; ANGELA CRUISHANK, an
individual; JEFF CRUISHANK, an
26 individual; VINCE MURPHY, an individual;
GARY MCSWEEN, an individual;
27 KATRINA WORGESS, an individual; LUIS
RONALDO HARNANDEZ ARRIAGA, an
28 individual; STEPHANIA AYO, an individual;

Case No.: 2:22-cv-01863-GMN-BNW

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO COUNTERCLAIM
(FIRST REQUEST)**

SILVIA AYO, an individual; CATALINA VASQUEZ, an individual; MATHIAS VASQUEZ, an individual; DOES 1 through 10, inclusive; and ROE CORPORATIONS I through X, inclusive,

Defendants.

AND ALL RELATED MATTERS.

Plaintiff/Counterdefendant INTERNATIONAL MARKETS LIVE INC., dba IM MASTERY ACADEMY (“IML” or “Plaintiff”) and Defendant/Counterclaimant IVAN TAPIA (“Tapia” and collectively, with IML, as the “Parties”), by and through their respective undersigned counsel of record, the law firms of Kerr Simpson Attorneys at Law and Holland & Hart LLP, and the law firm of SLIGHTING LAW, hereby stipulate and agree to a nine (9)-day extension of the current January 4, 2023 deadline for IML to answer or otherwise respond to Tapia’s Counterclaim (ECF No. 44), dated December 14, 2022, which is the first requested extension, as follows:

1. On December 14, 2022, Tapia filed his Answer and Counterclaim. (ECF No. 44).
2. IML’s answer to Tapia’s Counterclaim is currently due by January 4, 2023, under FRCP 12(a)(1)(B), which provides that “[a] party must serve an answer to a counterclaim or crossclaim within 21 days after being served with the pleading that states the counterclaim or crossclaim.”
3. IML is still assessing case facts and procedural status underlying Tapia’s Counterclaim.
4. The Parties stipulate and agree to extend the current January 4, 2023 deadline for IML to answer Tapia’s Counterclaim by nine (9) days to **January 13, 2023**.

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5. This Stipulation is made in good faith, not for purposes of undue delay, and supported by good cause.

IT IS SO STIPULATED.

DATED this 4th day of January 2023.

HOLLAND & HART LLP

SLIGHTING LAW

/s/ Lars K. Evensen

/s/ Bradley S. Slighting

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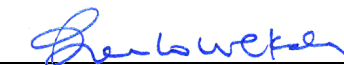
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Attorneys for Plaintiff

IT IS SO ORDERED:



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

DATED: January 5, 2023

HOLLAND & HART LLP
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LAS VEGAS, NV 89134

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of January 2023, a true and correct copy of the foregoing
**STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND TO
COUNTERCLAIM (FIRST REQUEST)** was served by the following method(s):

- ☒ **Electronic:** by submitting electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system and served on counsel electronically in accordance with the E-service list to the following email addresses:

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/s/ Brenda Schroeder

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